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DEPARTMENT OF SOCIAL SERVICES
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ARNOLD SCHWARZENEGGER
GOVERNOR

August 6, 2009

Kathy Gallagher, Director
Santa Barbara County
Department of Social Services
234 Camino del Remedio
Santa Barbara, CA 93110

Dear Ms. Gallagher:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided the reviewer from our office during the course of the Civil Rights Compliance Review of July 7-10, 2008. I apologize for the delay in forwarding the report of findings, and have enclosed the final report on the review.

There were some compliance issues (deficiencies) identified in the report, which will require the development of a corrective action plan (CAP). Please submit your CAP within sixty days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the attached report.

We will provide a copy of our report to any individual who makes a Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it too, becomes a public document.

If you need technical assistance in the development of your CAP, please feel free to contact the Civil Rights Bureau at (916) 654-2107 (voice) / (916) 654-2098 (TDD). You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

RAMÓN S. LOPEZ, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Michele Fitzpatrick, Civil Rights Coordinator

Chris Webb-Curtis, Branch Chief, CDSS Supplemental Nutrition Assistance Program
M.S. 8-9-32

Mike Papin, CDSS Supplemental Nutrition Assistance Program
Food Stamps Policy Bureau M.S. 8-9-32

Yvonne Lee, CDSS Supplemental Nutrition Assistance Program
Food Stamps Policy Bureau M.S. 8-9-32

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Hope Rios,
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
SANTA BARBARA COUNTY
DEPARTMENT OF SOCIAL SERVICES
Conducted
July 7-10, 2008**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
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(916) 654-2107**

Reviewer

Elsa Garcia

TABLE OF CONTENTS

- I. INTRODUCTION**
- II. SUMMARY OF METHODOLOGY**
- III. DISSEMINATION OF INFORMATION**
- IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**
- V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**
- VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**
- VII. STAFF DEVELOPMENT AND TRAINING**
- VIII. DISCRIMINATION COMPLAINT PROCEDURES**
- IX. CONCLUSION**

CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Santa Barbara County Department of Social Services (SBDSS) with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on July 7-10, 2008. An exit interview was held with Michele Fitzpatrick, Civil Rights Coordinator; Duncan Thomas, Civil Rights Investigator and Molly Marino, Facility Manager to review the findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Santa Barbara Main Office	234 Camino del Remedio, Santa Barbara	Non Assistance Food Stamps	Spanish
Santa Maria Main Office	2125 S. Centerpointe Pkwy, Santa Maria	CalWORKS	Spanish
Santa Maria Workforce Resource Center (WRC)	1410 S. Broadway, Santa Maria	Employment Services	Spanish
Lompoc Main Office	1100 W. Laurel Avenue Lompoc	Food Stamps, Children Services, IHSS	Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2007- 2008 Annual Civil Rights Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	11	6
Children Social Workers	1	1
Adult Program Workers	2	1
Employment Workers	4	3
Receptionist/Screeners	4	3
Total	22	14

Program Manager Surveys

Number of surveys distributed	3
Number of surveys received	3

Reviewed Case Files

English speakers' case files reviewed	19
Non-English or limited-English speakers' case files reviewed	45
Languages of clients' cases	Spanish, Oaxacan, Cambodian
Total	65

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	X			Access to services is available through mail or phone for all programs. Applications can be mailed in.
Does the county have extended hours to accommodate clients?	X			Arrangements can be made on a case-by-case basis.
Can applicants access services when they cannot go to the office?	X			Clients can access services by phone or mail. Also, home visits can be arranged if needed.
Does the county ensure the awareness of available services for individuals in remote areas?	X			There are full-service offices in the county's three major geographical areas and out-stationed workers in outlying areas.

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13)?	X			Staff interviewed stated the Pub 13 is distributed at intake and re-certification.

Signage, posters, pamphlets	Yes	No	Some- times	Comments
Is the pamphlet distributed and explained to each client at intake and re-certification?				Clients watch a video and Pub 13 is discussed in the first face-to-face interview. Also discussed at re-certification. If client is unable to come into office the Pub 13 is mailed to the home.
Was the current version of Pub 13 available in English, Spanish, Lao, Vietnamese, Chinese, Hmong, Russian, Korean, Farsi, Arabic, Laotian, Tagalog, Armenian and Cambodian?		X		There were no Pub 13's in the public lobby area of the 234 Camino del Remedio, Santa Barbara Office.
Was the Pub 13 available in large print, audiocassette and Braille?		X		The Pub 13 was not available in large print, audiocassette or Braille in the Lompoc Office, and in both of the Santa Maria offices.
Were the current versions of the required posters present in the lobbies?		X		The current version of the Pub 13 was not present in the Lompoc and both Santa Maria office lobbies.
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?		X		Not all staff interviewed were aware of the Civil Rights Coordinator's name.
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	X			Very good instructional signage was present in the threshold languages.

B. Corrective Actions

Informational Element	Corrective Action Required
Translated Pub 13	Santa Barbara County Department of Social Services shall ensure that the current version of the Pub 13 is available in all languages translated by CDSS and that the available translated versions are given to the clients in their primary language. Div. 21-115.2
Auxiliary aids	Santa Barbara County Department of Social Services shall ensure the availability of large print, Braille, and auditory aids for participants in all of the programs for which CDSS has oversight responsibility. Div. 21-115.4
Posters	Santa Barbara County Department of Social Services shall ensure that the most current version of posters on nondiscrimination provided by CDSS and USDA are prominently displayed in all waiting areas and reception rooms. Div. 21-107.211

Pub 13	"Your Rights under California Welfare Programs"	03/07
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact your program consultant to receive the most recent versions, or download the Pub 13 from the CRB website http://www.dss.cahwnet.gov/civilrights/YourRights_498.htm.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

A. Findings and Corrective Actions

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

1. Facility Location: 234 Camino del Remedio, Santa Barbara

Facility Element	Findings	Corrective Action
Parking	There is no "unauthorized parking" signage at entrance to off-street accessible parking.	Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p. 133
Parking Spaces	*Repeat Finding From 2006 There are over 50 parking spaces but fewer than 75. There were only two accessible parking spaces. The minimum number of accessible spaces required is three.	Accessible parking spaces shall be located as near as practical to a primary entrance and shall have the appropriate required number of spaces T24 CCR 1129B.1; ADAAG 4.1.2(5)(a)

	<p>The requirement is:</p> <table> <tr> <th>Total spaces</th> <th>Accessible spaces</th> </tr> <tr> <td>1-25</td> <td>=1</td> </tr> <tr> <td>26-50</td> <td>=2</td> </tr> <tr> <td>51-75</td> <td>=3</td> </tr> <tr> <td>76-100</td> <td>=4</td> </tr> </table> <p>Accessible space is too short: measured at 17'.</p> <p>*Repeat Finding From 2006 Van-Accessible space is too short measuring at 17'.</p>	Total spaces	Accessible spaces	1-25	=1	26-50	=2	51-75	=3	76-100	=4	<p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p.135</p> <p>Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p.135</p> <p>Van access aisle shall be 18' x 8' minimum on passenger side. (CA T24 1129 B.4.1, ADA 4.6.3) p.135</p>
Total spaces	Accessible spaces											
1-25	=1											
26-50	=2											
51-75	=3											
76-100	=4											
Water fountain	Drinking fountain spout is too high at 37 ½".	The spout is located within 6" of the front edge and 36" of the floor. The water stream is parallel to the front edge of the fountain. (CA T24 1115B.2.1.5.3, ADA 4.15.2) p. 213										
Men's Restroom	There are two entrance doors into the restroom; force to open both doors is excessive at 10 lbs. One of the two sinks has drain pipes that is not insulated or covered.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195 Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267										

	Soap Dispenser and Paper Towel dispenser are too high at 43".	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p. 269
Women's Restroom	Accessible signage on the wall is too high at over 60".	All symbols shall be centered on door at height of 60" above the floor. (CA T24 1115B.5) P 261.
	Force to open door is excessive at 8 lbs.	Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195
	Two of the three sinks have drain pipes that are not insulated or covered.	Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267
	Soap Dispenser and Paper Towel dispenser are too high at 47".	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p 269

2. Facility Location: 2125 S. Centerpointe Parkway, Santa Maria

Facility Element	Findings	Corrective Action
Parking	<p>There are three off-street entrances to parking lot at this location. The entrance off of Centerpointe Road did not have "Unauthorized parking" signage.</p> <p>There are accessible parking spaces located to the right and left side of the entrance where the water fountain is. To the left of the water fountain there are two accessible spaces. One of the freestanding signs is too low at 78". Tree branches obstruct the sign.</p> <p>The accessible space measurement is too short at 17'4.</p>	<p>Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____." (CA T24 1129B.5) p. 133</p> <p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p. 133</p> <p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135 Access aisle shall be 18' x 5' minimum for cars. (CA T24 1129B.4.1 & 2, ADA 4.6.3) p. 135</p>

	<p>The accessible parking spaces to the right of the water fountain contain freestanding signs which are too low at 74".</p> <p>The accessible space measurement is too short in length at 17'2".</p> <p>There is no directional signage to accessible entrance.</p>	<p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p. 133</p> <p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p 135</p> <p>A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.8.1.2) pp. 183, 353</p>
Water fountain	Drinking fountain is too high at 40 ½".	The spout is located within 6" of the front edge and 36" of the floor. The water stream is parallel to the front edge of the fountain. (CA T24 1115B.2.1.5.3, ADA 4.15.2) p. 213
Men's Restroom	There was no accessible signage on wall adjacent to latch outside of door.	<p>All symbols shall be centered on door at height of 60" above the floor. (CA T24 1115B.5) p. 261</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263</p>

	<p>Force to open door is excessive at over 5 lbs.</p> <p>Accessible urinal is too high at 18".</p> <p>Paper towel dispenser (by mirror) is too high at over 40".</p>	<p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195</p> <p>Rim height shall be a maximum of 17" in height above the floor. (CA T24 1115B.2.1.1.1, ADA 4.18.2) p. 265</p> <p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p. 269</p>
Women's Restroom	No accessible signage on wall adjacent to latch outside of door.	<p>All symbols shall be centered on door at height of 60" above the floor. (CA T24 1115B.5) p. 261</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263</p>

		<p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p>
	Force to open door is excessive at 15 lbs.	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195</p>
	Soap dispenser and towel dispenser are too high at over 40".	<p>If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p. 269</p>
	One of the three sinks has drain pipes that are not insulated or covered.	<p>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267</p>
	The toilet tissue dispenser is not located within 12" of the front edge of toilet.	<p>Toilet tissues dispensers are located on the wall within 12" of front edge of toilet seat. (CA T24 1115B.9.3) pp. 275, 269</p>

B. Recommendation

In the men's restroom there were two paper towel dispensers, one at which was not in use. The unused paper towel dispenser meets the height requirement. The county should utilize the unused dispenser instead of the one currently in use.

3. Facility Location: 1410 S. Broadway, Santa Maria

Facility Element	Findings	Corrective Action
SBCDSS Main entrance doors	<p>There are two separate entrances at this building. One of which is the Workforce Resource Center (WRC) entrance. The WRC has automatic doors and is out of service, the outside button requires maintenance.</p> <p>SBCDSS entrance door is too heavy at 12 lbs.</p>	<p>Interior door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195</p>
Client lobby	<p>Pub 13 was not available in large print, Braille, or audio.</p>	<p>Div 21-107.221</p>
Interview room	<p>Client interview room is too small and would prevent client from turning in a 60" diameter or T-shaped space.</p>	<p>Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space. (CA T24 1118B.3, ADA 4.2.3) p. 217</p> <p>Minimum seating knee space is 27" high, 30" wide and 19" deep. (CA T24 1122B.3, ADA 4.32.3) p. 349</p>
Men's Restroom	<p>Force to open door is excessive at 10 lbs.</p> <p>Accessible urinal is too high at 19".</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195</p> <p>Rim height shall be a maximum of 17" in height above the floor. (CA T24 1115B.2.1.1.1, ADA 4.18.2) p .265</p>

	<p>Drain pipes under sink are not insulated or covered.</p>	<p>Urinals: Where there are urinals provided, at least one (1) shall provide a clear floor space of 30" wide x 48" deep in front of the urinal to allow for a forward approach. This clear space may extend 6" maximum under the urinal if the urinal has a 9" minimum toe clearance from the floor to the urinal's bottom. (CA T24 1115B.9.4, ADA 4.18.3 & 4.22.5) p. 265</p> <p>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267</p>
Women's Restroom	<p>Force to open door is excessive at 13 lbs.</p> <p>Drain pipes under sink are not insulated or covered.</p>	<p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195</p> <p>Hot water and drain pipes are insulated or covered. No sharp or abrasive surfaces under lavatories. (CA T24 1115B.2.1.2.2, ADA 4.19.4) p. 267</p>

4. Facility Location: 1100 W. Laurel Avenue, Lompoc

Facility Element	Findings	Corrective Action
Parking	<p>There are two accessible spaces. One of the freestanding signs is too low at 70".</p> <p>Accessible space is too short in length at 17' 8".</p>	<p>Sign height shall be 80" minimum from bottom of sign to top of finish grade. (CA T24 1129B.5, ADA 4.6.5) p. 133</p> <p>Length of parking space shall be at least 18' long, 9' wide. (CA T24 1129B.4.1) p. 135</p>

	Soap dispenser and mirror base are too high at over 40".	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p. 269
Women's Restroom	<p>No signage on the wall adjacent to the latch side of the door.</p> <p>Force to open door is excessive at over 5 lbs.</p> <p>Sink rim/height counter is too high at 37"</p>	<p>All symbols shall be centered on door at height of 60" above the floor. (CA T24 1115B.5) p. 261</p> <p>For permanent identification, the sign shall be installed on the wall adjacent to latch outside of door. If there is no space, including at double leaf doors, the sign shall be placed on nearest adjacent wall, preferably on the right. (CA T24 1117B.5.7, ADA 4.30.6) p. 263</p> <p>Raised characters shall be raised 1/32" minimum and shall be Sans Serif upper case characters accompanied by Grade 2 Braille. (CA T24 1117B.5.5.1, ADA 4.30.4) p. 263</p> <p>Interior Door will have 5 pounds maximum pressure. (CA T24 1133B.2.5, ADA 4.13.11(2)(b)) p. 195</p> <p>Sink is mounted with a counter or rim no higher than 34". (ADA 4.24.2 & 4.19.2) pp. 311, 267</p>

	Soap dispenser and mirror base are too high at over 40".	If towel, sanitary napkins, waste receptacles, and other similar dispensing and disposal fixtures are provided, at least one of each type is located with all operable parts, including coin slots, at a maximum height of 40". (CA T24 1115B.9.2 and CA T24 1115B.9.1.2, ADA 4.19.6) p. 269
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V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	X			Client indicates language preference on their application at intake.

Question	Yes	No	Some-times	Comments
Does the county use a primary language form?		X		Clients indicate on SAWS1 form and/or Public Assistance Inquiry Form.
Does the client self-declare on this form?	X			Clients indicate on SAWS1 form.
Are non-English- or limited- English-speaking clients provided bilingual services?	X			Client is assigned to a bilingual worker. If county does not have bilingual worker that speaks the client's language, the county will secure an interpreter.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	X			Workers contact Human Resources worker Duncan Thomas and he arranges for interpreter.
Is there a delay in providing services?		X		No delay in obtaining bilingual workers or telephone Interpretive Services.
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	X			County has professional telephone Interpreter services.
Are county interpreters determined to be competent?	X			County does in-house bilingual certification. Bilingual workers are tested on speaking, reading, and writing skills. They must pass tests to be certified.
Does the county have adequate interpreter services?	X			The county is adequately staffed with bilingual staff and also utilizes a professional telephone interpreter service.
Does the county allow minors to be interpreters? If so, under what circumstances?		X		

Question	Yes	No	Some-times	Comments
Does the county allow the client to provide his or her own interpreter?	X			If the client brings their own interpreter, they must be over the age of 18.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	X			If a client brings in an interpreter, they are required to sign a release form.
Does the county use the CDSS-translated forms in the clients' primary languages?	X			Staff interviewed stated that forms are available on-line and the forms supply room. If they need assistance the staff request forms through the Forms Supervisor.
Is the information that is to be inserted into NOA translated into the client's primary language?	X			On-line Notice Of Action (NOA) forms have been translated into Spanish, and other languages. If needed bilingual worker can also translate form if not available.
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?		X		In both the Santa Monica Offices and the Lompoc Office, the Pub 13 was not available in large print, Braille or audio. In the Santa Maria office located at 1444 Broadway, the receptionists were not aware of these alternative formats.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	X			Staff interviewed state that the case is marked with a green pen/flag to identify that client needs assistance. Staff also stated that they assist client by reading forms to client to ensure client understands the material being covered.
Does the county offer screening for learning disabilities?	X			Screening is available in the Welfare to Work Program.

Question	Yes	No	Some-times	Comments
Is there an established process for offering screening?	X			In the Welfare to Work program, the work project coordinator is responsible for offering screening to clients.
Is the client identified as having a learning disability referred for evaluation?	X			Client is referred to Department of Rehabilitation or other community resources.

B. Corrective Actions

Area of Findings	Corrective Actions
Auxiliary Aids	Santa Barbara County Department of Social Services shall ensure the availability of auxiliary aids and services to persons who are deaf or hearing impaired, or persons with impaired speech, vision or manual skills where necessary to afford such persons an equal opportunity to access program services. Div 21-115.41

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, for oral and written communications, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	Children's Services	Adult Programs	CalWORKs/ Employment Services	Non-Assisted Food Stamps
Ethnic origin documentation	Referral Form, and Court documents	SOC341, Public Assistance Inquiry Form	SAWS1, Public Assistance Inquiry Form	SAWS1, Public Assistance Inquiry Form
Primary language documentation	Referral Form, and Court documents	SOC341, Public Assistance Inquiry Form	SAWS1, DSA 882, Public Assistance Inquiry Form	SAWS1, Public Assistance Inquiry Form

Documented Item	Children's Services	Adult Programs	CalWORKs/ Employment Services	Non-Assisted Food Stamps
Method of providing bilingual services and documentation	Assigned to bilingual worker.	Assigned to bilingual worker and noted in case narrative.	Assigned to bilingual worker. No documentation found in cases reviewed.	Assigned to bilingual worker. No documentation found in cases reviewed.
Client provided own interpreter	No cases found in this case sample.	Documented in case narrative.	No cases found in this case sample	No cases found in this case sample
Method to inform client of potential problem using own interpreter	It would be verbally explained to client.	Verbally explained to client and noted in the case narrative along with signed release form.	It would be verbally explained to client.	It would be verbally explained to client.
Release of information to Interpreter	Client is advised and must sign release form W-711	Client is advised and must sign release form W-711	Client is advised and must sign release form W-711	Client is advised and must sign release form W-711
Individual's acceptance or refusal of written material offered in primary language	Client would be asked and response noted in case file comments.	Client is asked and response noted in case file comments	Client is verbally asked at initial visit and response is recorded in computer data base.	Client is verbally asked at initial visit and response is recorded in computer data base.
Documentation of minor used as interpreter	N/A	N/A	N/A	N/A
Documentation of circumstances for using minor interpreter temporarily	N/A	N/A	N/A	N/A

Documented Item	Children's Services	Adult Programs	CalWORKs/ Employment Services	Non-Assisted Food Stamps
Translated notice of actions (NOA) contain translated inserts	No cases found in this case sample	No cases found in this case sample.	Translated inserts found in Spanish (threshold language). Other languages are available.	Notices have translated inserts in Spanish (threshold language). Other languages are available.
Method of identifying client's disability	Would be noted in ERR or case comments.	Noted on Face Sheet and/or case summary.	SOF	SOF
Method of documenting a client's request for auxiliary aids and services	No cases found in this case sample	No cases found in this case sample	No cases found in this case sample	No cases found in this case sample

B. Corrective Actions

Documentation that bilingual services were provided	Santa Barbara County Department of Social Services shall document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22
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VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	X			Staff interviewed stated that they receive training on an on-going basis.
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	X			
Does the county provide employees Cultural Awareness Training?	X			The county provides cultural awareness training and staff interviewed stated that they appreciate it and can better understand cultural differences.
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	X			
Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	X			Staff interviewed is aware of predominant cultural groups in their area.

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	X			Staff were able to easily identify the difference between a discrimination complaint, program complaint, and personnel complaint.

Interview and review areas	Yes	No	Some-times	Findings
Did the employees know who the Civil Rights Coordinator is?		X		Not all staff interviewed were aware who the Civil Rights Coordinator is.
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	X			Staff interviewed knew the location of the civil rights poster.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	X			Complaint log was current and up to date.

B. Corrective Action

Element	Corrective Action
Civil Rights Coordinator	Santa Barbara County Department of Social Services shall ensure that staff is knowledgeable regarding contact information for the civil rights coordinator. At a minimum, where the information can be located. Div. 21-117 and 21-107.21

IX. CONCLUSION

The CDSS would like to acknowledge and thank all staff involved with the review, Michelle Fitzpatrick, Civil Rights Coordinator, and especially Mr. Duncan Thomas, Civil Rights Investigator, for his outstanding coordination, assistance, and cooperation during the review. Staff interviewed were found to be professional, pleasant and committed to providing superior service to their clients.

The Santa Barbara County Department of Social Services was found to be in compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws. There are repeat parking lot deficiencies at: 234 Camino Del Remedio, Santa Barbara.

The Santa Barbara County Department of Social Services must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule by which all actions will be taken to correct the violations. Upon completion, please send photographs via e-mail to crb@dss.ca.gov, or mail them to the Civil Rights Bureau at; 744 P Street, M.S. 8-16-70, Sacramento, CA 95814.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance deficiencies and to provide the county with an opportunity to implement corrective actions to achieve compliance with Division 21 regulations. Civil Rights staff are available to provide technical assistance as requested.